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Attorney for Plaintiff

5
6 **UNITED STATES DISTRICT COURT**
7 **DISTRICT OF NEVADA**

8 HELEN BRENNAN, individually
9 Plaintiff,

10 vs.

11 STATE OF NEVADA ex rel LAS VEGAS
METROPOLITAN POLICE
12 DEPARTMENT, a political subdivision of
the State of Nevada; STATE OF NEVADA
13 ex rel NEVADA HIGHWAY PATROL, a
political subdivision of the State of Nevada;
14 TROOPER L. McCOLL, P#352, an
individual employed by STATE OF
15 NEVADA ex rel NEVADA HIGHWAY
PATROL, a political subdivision of the State
of Nevada; DOE TROOPERS I through XX,
16 employed by STATE OF NEVADA ex rel
NEVADA HIGHWAY PATROL, a political
17 subdivision of the State of Nevada; DOE
OFFICERS I through XX, employed by
18 STATE OF NEVADA ex rel ex rel LAS
VEGAS METROPOLITAN POLICE
19 DEPARTMENT, a political subdivision of
the State of Nevada; DOES I through X; and
20 ROE Business Entities I through X;
inclusive,
21 Defendants.

CASE NO.: 2: 20-cv-00662-RFB-DJA

STIPULATION AND PROPOSED
ORDER TO EXTEND THE TIME IN
WHICH THE PLAINTIFF MAY
RESPOND TO DEFENDANTS LAS
VEGAS METROPOLITAN POLICE
DEPARTMENT'S MOTION FOR
PARTIAL SUMMARY JUDGMENT ON
PLAINTIFF'S MONELL CLAIM

(FIRST REQUEST)

22
23 Plaintiff, HELEN BRENNAN and Defendants LAS VEGAS METROPOLITAN
24 POLICE DEPARTMENT, by and through their respective counsel, hereby stipulate and agree as
25 follows:

26
27 1. On May 21, 2021, Defendant, LAS VEGAS METROPOLITAN POLICE
28 DEPARTMENT filed Defendants Las Vegas Metropolitan Police Department's Motion For

Partial Summary Judgment On Plaintiff's Monell Claim, District of Nevada, designated Case No.,:
2: 20-cv-00662-RFB-DJA, ECF No. 36.

2. On, May 21, 2021, the court ordered a response due by June 11, 2021.

3. From the time of receiving the Defendant's Motion, Lead Civil Attorney Laura Ungaro had already been on a medical leave from the firm with no return date, and civil paralegal Susie Ward contracted COVID-19 on May 26, 2021 whom is most familiar to this matter.

4. The Plaintiff requested an additional two weeks to get their new Civil Attorney up to speed to this matter to draft the response making the new proposed deadline June 25, 2021.

5. This is the first request for an extension regarding the filing of Plaintiffs response to Defendant's Motion for Partial Summary Judgment, which is made in good faith, not for the purposes of delay, and neither party is prejudiced by the short extension.

DATED this 3rd day of June, 2021.

DATED this 3rd day of June, 2021.

MUELLER & ASSOCIATES, INC.

KAEMPFER CROWELL

/s/ Craig A. Mueller, Esq.

/s/ Lyssa S. Anderson, Esq.

CRAIG A. MUELLER, ESQ.

LYSSA S. ANDERSON, ESQ.

Nevada Bar No. 4703

Nevada Bar No. 5781

808 South Seventh Street

1980 Festival Plaza Drive, Suite 650

Las Vegas, NV 89101


Las Vegas, NV 89135

Attorney for Plaintiff

*Attorney for Las Vegas Metropolitan
Police Department*

IT IS SO ORDERED.

DATED this 4th day of June, 2021.



RICHARD E. BOULWARE, II
United States District Court

From: [Lyssa Anderson](#)
To: [Susie Ward](#)
Subject: RE: Brennan- Extension Request
Date: Thursday, June 3, 2021 12:44:38 PM

Susie,

You may use my e-signature to file.



Lyssa S. Anderson
Kaempfer Crowell
1980 Festival Plaza Drive, Suite 650
Las Vegas, NV 89135-2958
Tel: (702) 792-7000
Fax: (702) 796-7181
Email: landerson@kcnvlaw.com

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From: Susie Ward [<mailto:Susie@craigmuellerlaw.com>]
Sent: Thursday, June 3, 2021 12:22 PM
To: Lyssa Anderson
Subject: RE: Brennan- Extension Request

Please review the attached proposed order, thank you for this.

Sincerely,

Susie Ward

Paralegal,
Mueller and Associates
th

808 S. 7 Street
Las Vegas, NV 89101
P- 702-382-1200
F- 702-637-4817
susie@craigmuellerlaw.com

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From: Lyssa Anderson <landerson@kcnvlaw.com>
Sent: Thursday, June 3, 2021 10:37 AM
To: Susie Ward <Susie@craigmuellerlaw.com>
Subject: Re: Brennan- Extension Request

That's fine. Please send us a proposed stipulation.

Hope you are well.

Best Regards,
Lyssa S. Anderson

On Jun 3, 2021, at 10:32 AM, Susie Ward <Susie@craigmuellerlaw.com> wrote:

Lyssa,

Would you stipulate to an extension on our opposition for two weeks making it due the 25th if the court will allow it? I am out on quarantine and Laura Ungaro is not coming back to the firm for medical issues. I just finally got a new civil attorney that needs to get up to speed on this matter. Please let me know so I can get the stipulation to you, thank you.

Sincerely,

Susie Ward

Paralegal,
Mueller and Associates
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P- 702-382-1200
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